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UNITED STATES DISTRICT COURT  
For the  
Western District of Oklahoma

QUILL INK BOOKS LIMITED, a  
foreign corporation,  
*Plaintiff*

Civil Action No. CIV-18-00920-G

v.

ABCD GRAPHICS AND DESIGN, D/B/A  
Blushing Books, et al.  
*Defendant*

Allison Travis, being of lawful age and duly sworn, allege and state the following:

1. I am the production manager of ABCD Graphics and Design, a Virginia Corporation. ABCD Graphics and Design publishes romance fiction under multiple imprints, including Blushing Books, and Blushing Books Publications.
2. I have worked for ABCD Graphics and Design since 2007.
3. In April 2018, my boss and I were contacted by Rachelle Soto who writes as Addison Cain. Ms. Cain had been contacted by numerous readers with concerns that her title, "Born to Be Bound" (published by Blushing Books imprint in April 2016) had possibly been plagiarized by an author named Zoey Ellis, in her title "Crave to Conquer" (published January 2018).
4. I have never read any book written by Ms. Cain or Ms. Ellis, so I only went by what information I was given by Ms. Cain, with her concerns of the similarities and possible plagiarism of her book.

5. Ms. Cain sent us several instances where the plots of both books were very similar.

6. A. Omegas are disappearing = Omegas are starving

B. Cailyn seeks help (information) for Omegas and Drocco can provide that. Claire seeks help (food) for Omegas and Sheppard can provide that.

C. Cailyn suppresses her Haze (by use of magic) = Claire suppresses her Heat by use of drugs.

D. Cailyn's magic stops working and she goes into Haze in a room full of alphas = Claire's Heat suppressants were actually Heat prompters and she goes into heat in a room full of alphas.

E. Cailyn becomes despondent once her Haze is over; Drocco is mystified on why she doesn't act like an Omega. = Claire becomes despondent once her Heat is over; Sheppard is mystified on why she doesn't act like an Omega.

F. Both Drocco and Sheppard seek outside help to get their Omegas to act right rather than ask their Omegas why they don't act right.

G. Cailyn escapes the second she has an opportunity = Claire escapes the second she has an opportunity.

7. Ms. Cain then emailed us saying she was being attacked publicly even though she had stayed quite on this matter. She also sent us online comments from readers that raised concerns about the similarities of the two plot books.

8. In April 2018, I was provided by Ms. Cain a spreadsheet and a list that demonstrated dozens of instances in the plot, that were similar between the two titles.

9. After consultation with Ms. Cain, who was adamant that we proceed with action, I was advised by my boss, to coordinate with Ms. Cain in sending takedown notices to Barnes & Noble, Apple, Kobo, Amazon, and Google Play.

10. I filed online take down notices between late April and late May 2018 to Barnes & Noble, Apple, Kobo, Amazon and Google Play.

11. Neither I nor anyone acting on behalf of our company ever filed a notice with Draft2Digital.

12. As a result of DMCA notices filed by ABCD Graphics and Design, the titles were removed from Apple, Barnes & Noble, and Kobo during the review process. They were never removed from Amazon or Google Play.

13. In May 2018, after still not hearing from Amazon and having followed up with them several times at the request of Ms. Cain, I was asked by Ms. Cain to contact the copyright agent in the legal department at Amazon. She provided me with an address, phone number, fax number and email. I called and spoke to someone there who stated she would escalate our claim. We never heard anything after that phone call.

14. In late May 2018 we were contacted by Ms. Cain again stating that Amazon had rejected her copyright infringement claim, that she had filed directly with Amazon, telling her that the parties involved needed to settle this dispute.

15. I am uncertain about the status of Quill Ink Books Limited. I have never had any dealings with them directly, nor heard of them outside of these books. Although an email from Apple iBooks to ABCD Graphics in May of 2019 did identify Quill Ink as the publisher, Apple's own instructions to us advised us to contact "Zuri Amarcya."

16. Our company received a cease and desist notice from Texas attorney, Margarita Coale, in late May 2018. This cease and desist does not mention Quill Ink Books. The client is identified as only Zoey Ellis.

17. In July 2018, Apple, Barnes & Noble, and Kobo, placed Ms. Ellis's titles back up for sale.

18. At no point in time, have I, Allison Travis, or any employee of this company (to my knowledge) posted any statements to any online forums regarding Ms. Ellis, Quill Ink, or this situation.

19. I have never filed a DMCA take down notice against another title or author in the "Omegaverse" universe.

I, Allison Travis, swear/affirm under oath, and under penalty of perjury, that I have read the foregoing AFFIDAVIT and that the statements set forth therein are true and correct to the best of my knowledge.

[Signature]  
Signature

6/24/19  
Date

Subscribed and affirmed, or sworn

to before me in the County of Prince Edward State of Virginia, this  
24<sup>th</sup> day of June, 20 19. My Commission Expires:

04-30-2023

[Signature]

Notary Public

